

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**TEH SHOU KAO and T S KAO, INC., on  
behalf of themselves and all others similarly  
situated,**

**Plaintiffs,**

**v.**

**CARDCONNECT CORP.,**

**Defendant.**

Consolidated Civil Action No. 2:16-cv-5707

HON. GERALD J. PAPPERT

**TECH LOUNGE SP, LLC and THE LAW  
OFFICE OF KEVIN ADAMS, PLLC, on  
behalf of themselves and all others similarly  
situated,**

**Plaintiffs,**

**v.**

**CARDCONNECT CORP.,**

**Defendant.**

**UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

COME NOW Plaintiffs, by and through their undersigned counsel, and hereby respectfully move the Court, pursuant to Federal Rule of Civil Procedure 23, for an order (1) preliminarily approving the parties' class settlement; (2) certifying the settlement class; (3) appointing Plaintiffs as class representatives and their counsel as class counsel; (4) approving the notice program; and (5) scheduling the final approval hearing. The motion is not opposed by Defendant.

The motion is based on the memorandum of law in support, the parties' settlement agreement and all exhibits thereto (Exhibit A to the memorandum of law), the joint declaration

of E. Adam Webb and Matthew C. Klase and all exhibits thereto (Exhibit B to the memorandum of law), and all pleadings and filings in this consolidated action.

As set forth more fully in the memorandum of law, the requested relief is appropriate because (1) the parties' settlement is fair, adequate, and reasonable and meets all requirements for preliminary approval as articulated by the Third Circuit and Rule 23(e)(2), (2) the requirements of Rule 23(a) and (b)(3) are met and thus certification of the settlement class is warranted, and (3) the proposed notice program satisfies due process and Rule 23(e). For the Court's convenience, a proposed order is filed herewith.

**Dated: June 19, 2020**

**Respectfully submitted,**

*/s/ E. Adam Webb*

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of June, 2020, I caused the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system which automatically sends email notification of such filing to all attorneys of record.

/s/ E. Adam Webb  
E. Adam Webb